

JUDGE KATHLEEN CARDONE

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

2020 JUL -8 PM 6:10

UNITED STATES OF AMERICA,

§ CRIMINAL NO. EP-20-CR-

Plaintiff,

§ INDICTMENT

v.

§ CT 1: 18 U.S.C. § 875(c) -

MANUEL FLORES,

§ Communicating a Threat in Interstate
Commerce

Defendants.

§
§

EP20CR1510

THE GRAND JURY CHARGES:

COUNT ONE
(18 U.S.C. § 875(c))

That on or about June 13, 2020, in the Western District of Texas, and elsewhere, the
Defendant,

MANUEL FLORES,

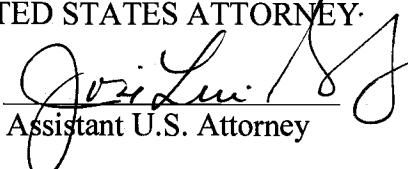
knowingly and willfully did transmit a communication in interstate and foreign commerce, and the
communication contained a threat to injure Black Lives Matter protesters, specifically stating that
he had “500 rounds of something, 500 rounds of 5.56” and to “take out at least 200” individuals,
in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL

ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY: 
Assistant U.S. Attorney